

**Executive Orders VR-203-E and VR-204-E
VST Phase II EVR System**

**Exhibit 12
Veeder-Root Vapor Polisher
Hydrocarbon Emissions Verification Procedure**

Definitions common to all certification and test procedures are in:

D-200 Definitions for Vapor Recovery Procedures

For the purpose of this procedure, the term "ARB" refers to the California Air Resources Board, and the term "ARB Executive Officer" refers to the Executive Officer of the ARB or his or her authorized representative or designate.

1. PURPOSE AND APPLICABILITY

This test procedure is used to verify the proper performance of the Veeder-Root Vapor Polisher. The test determines hydrocarbon (HC) emissions under iso-butane vapor loading conditions.

The station may remain open (normal fuel dispensing, deliveries, etc.) while conducting this procedure.

2. PRINCIPLE AND SUMMARY OF TEST PROCEDURE

This procedure is used to verify proper performance of the Veeder-Root Vapor Polisher in meeting the hydrocarbon (HC) emission specification listed in Exhibit 2. A 10% iso-butane compressed gas standard is used as the inlet test gas (i.e., to provide HC flow at the Vapor Polisher inlet) while monitoring HC emissions from the Vapor Polisher exhaust using a portable non-dispersive infrared (NDIR) analyzer calibrated to iso-butane. The flow through the Vapor Polisher and HC monitoring is maintained for six (6) minutes.

3. BIASES AND INTERFERENCES

- 3.1 This test shall not be conducted if the Vapor Polisher percent load is greater than 80% (VR-203 IOM Section 16, PMC Diagnostic Menu, or VR-204 IOM Section 16, PMC Diagnostic Menu).
- 3.2 Exhibit 11 (Vapor Polisher operability tests) must be conducted prior to conducting the Exhibit 12 test to assure valid results.
- 3.3 Catalytic bead HC sensors shall not be used for this test due to the absence of air in the inlet test gas.

- 3.4 Values measured at less than or greater than 0.9% by volume should not be considered as quantitative results since accuracy and calibration checks are not required by this test at those levels.

4. EQUIPMENT

- 4.1 An inlet test gas of 10% by volume iso-butane in nitrogen.
- 4.2 Flow control valve with a full scale of 20 to 40 standard cubic feet per hour (scfh).
- 4.3 A flow meter with 18.3 scfh full scale range and $\pm 2\%$ of full scale accuracy. The meter must be accurate within 0.4 scfh for any flow setting made during the prescribed tests.
- 4.4 Gasoline resistant hoses, fittings, connectors.
- 4.5 Portable NDIR hydrocarbon analyzer, 0 to 1.8 % by volume range (0 to 18,000 ppm, or 100% lower explosive level (LEL) for iso-butane), with a minimum accuracy of $\pm 0.1\%$ by volume, such as RKI Instruments "Eagle" model (with NDIR HC sensor) or equivalent. Only an NDIR analyzer calibrated to iso-butane may be used for this test. The manufacturer's operating instructions for the HC analyzer and proof or evidence that the sensor is NDIR shall be kept with the equipment at all times so that proper procedure can be verified.
- 4.6 Ladder or other access means to manually sample vapor outflow from the top of the Vapor Polisher assembly.
- 4.7 A calibration check gas of iso-butane in nitrogen or air at a concentration of 0.9% by volume (9,000 ppm or 50% LEL). The calibration check gas must be certified to an analytical accuracy of $\pm 2\%$ traceable to a reference material approved by the National Institute of Standards and Technology (NIST) and recertified at least every two years.
- 4.8 An inlet test gas of iso-butane **in nitrogen** (air balance gas not allowed) at a nominal concentration of 10% by volume (100,000 ppm). The actual value of the gas concentration shall be between 9.7 and 10.3% by volume (97,000 to 103,000 ppm). The calibration check gas must be certified to an analytical accuracy of $\pm 2\%$ traceable to a reference material approved by the National Institute of Standards and Technology (NIST) and recertified at least every two years.
- 4.9 Pressure regulators for the calibration check gas cylinder and the inlet test gas cylinder.
- 4.10 Stopwatch with an accuracy of ± 0.2 seconds.

5. CALIBRATION REQUIREMENTS

- 5.1 All flow measuring devices shall be bench tested for accuracy using a reference gauge or NIST traceable standard at least once every 180 consecutive days. Accuracy checks shall be performed at a minimum of five (5) points (e.g., 10, 25, 50, 75 and 90 percent of full scale). A copy of the most current accuracy check of the flow meter shall be kept with the equipment.
- 5.2 Information on the calibration check gas and inlet test gas shall be entered into a log identifying each cylinder by serial number. Documentation of certification shall be maintained with the gas cylinders at all times and shall also be attached to Form 1. The calibration check gas log shall be maintained with the gas cylinders at all times and made readily available to the district upon request. Sufficient information shall be maintained to allow a determination of the certification status of each calibration gas and shall include: (1) the date put in service, (2) assay result, (3) the dates the assay was performed, and (4) the organization and specific personnel who performed the assay.

6. PRE-TEST REQUIREMENTS

- 6.1 Follow the HC analyzer manufacturer's procedure for instrument start-up and warm-up.
- 6.2 Check the zero reading of the HC analyzer using ambient air. If the result is greater than 0.1% by volume (1000 ppm) then re-zero the analyzer per the manufacture's recommended procedures. Record results on Form 1.
- 6.3 Check the calibration of the HC analyzer by running the 0.9% by volume calibration check gas following the manufacturer's procedures. The reading must be between 0.8% and 1.0% by volume. Record results on Form 1. If the result is outside of the required range then the analyzer shall be recalibrated per manufacturer's specifications prior to conducting this test.
- 6.4 Assemble the inlet test gas cylinder, regulator, flow meter and flow control valve, and transfer line as shown in Figure 1. Attach the HC analyzer sampling line to the outlet test port ¼ inch NPT fitting on the top of the polisher as shown in Figure 1.
- 6.5 Visually check to ensure the inlet 3-way valve (see **Figure 1**) to the Vapor Polisher is in the closed test position so the flow is coming from the inlet test gas to the inlet of the Vapor Polisher.

- 6.6 At the TLS console, set the Vapor Polisher to the manual open position (reference VR-203 IOM Section 16, PMC Diagnostic Menus, or VR-204 IOM Section 16, PMC Diagnostic Menus).

7. TEST PROCEDURE

- 7.1 Set the inlet test gas flow rate to 15 scfh. Adjust the flow rate as necessary during the test to maintain the flow rate of 14 to 16 scfh. Start the stopwatch. Record the start and end flow rates on Form 1.
- 7.2 Record the first HC reading three (3) minutes after starting the stopwatch. Take three (3) more readings one (1) minute apart for a total test time of 6 minutes.
- 7.3 Record the HC concentration for each minute from minute 3 to 6 on Form 1, with other required information. All results less than 0.9% by volume shall be recorded as "< 0.9%". All results greater than 0.9% by volume shall be recorded as "> 0.9%".
- 7.4 Alternative to Form 1: Districts may require the use of an alternate Form, provided it includes the same minimum parameters identified in Form 1.
- 7.5 Remove test equipment. Re-install the outlet test port cap by applying Teflon™ tape to the threads and tighten the cap ¼ inch turn past snug. Ensure that the 3-way inlet valve is in the normal operating ("open") position. At the TLS console re-set the Vapor Valve to the automatic mode.

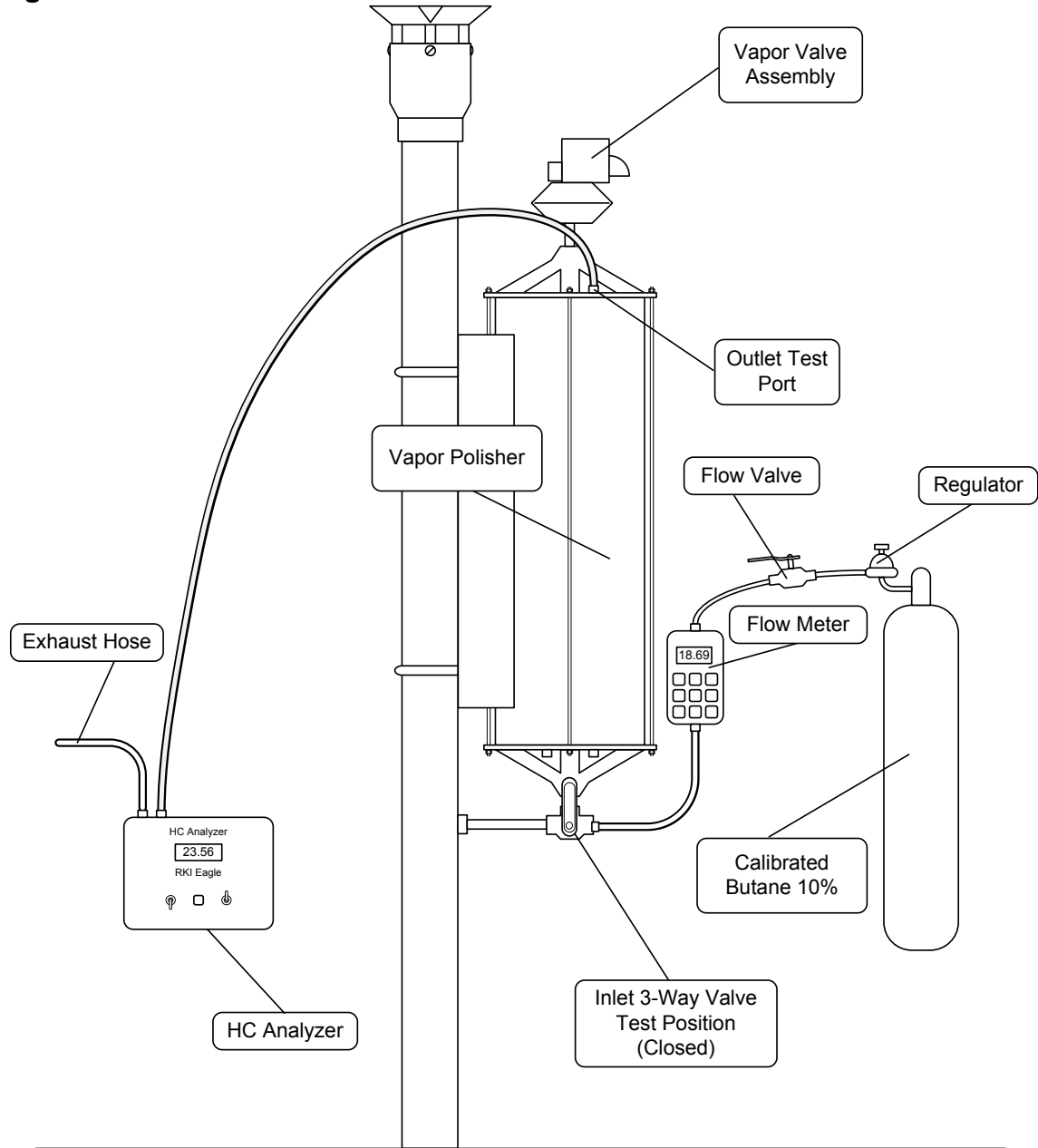
8. RESULTS

If the emission concentration is $\geq 0.9\%$ by volume (9,000ppm or 50% LEL) during any part of the test, then the Vapor Polisher is not in compliance with the Exhibit 2 HC emission requirements.

9. ALTERNATIVE TEST PROCEDURES

This procedure shall be conducted as specified. Modifications to this test procedure shall not be used to determine compliance unless prior written approval has been obtained from the ARB Executive Officer, pursuant to Section 14 of Certification Procedure CP-201.

Figure 1



FORM 1: VEEDER ROOT VAPOR POLISHER HC EMISSIONS TEST

DATE OF TEST:

SERVICE COMPANY NAME	SERVICE COMPANY'S TELEPHONE
SERVICE TECHNICIAN	VEEDER-ROOT TECH CERTIFICATION #(as applicable) ICC or DISTRICT TRAINING CERTIFICATION (as applicable)
STATION NAME	DISTRICT PERMIT #
STATION ADDRESS	CITY STATE ZIP

STEP 6.2 6.3	CAL GAS DOCUMENTATION ATTACHED? <input type="checkbox"/> HC ANALYZER ZERO CHECK READING: _____ HC ANALYZER CAL CHECK READING: _____ IS THE ZERO READING < 0.1% BY VOLUME? Yes No IS THE CAL CHECK READING BETWEEN 0.8% AND 1.0%? Yes No (IF NO: THE HC ANALYZER MUST BE RE-CALIBRATED.)
STEP 6.5 6.6	3-WAY VALVE IN CORRECT POSITION (PER FIG. 1)? <input type="checkbox"/> PMC VALVE MODE SET TO MANUAL OPEN? <input type="checkbox"/>
STEP 7.1	START FLOW RATE: _____ END FLOW RATE: _____
STEP 7.3	HC READING AT 3 MIN: _____ HC READING AT 4 MIN: _____ HC READING AT 5 MIN: _____ HC READING AT 6 MIN: _____ IS THE HC CONC. < 0.9% BY VOLUME FOR ALL READINGS? Yes No (IF NO: THE VR POLISHER IS NOT IN COMPLIANCE WITH THE HC EMISSION REQUIREMENTS OF EXHIBIT 2.)
STEP 7.5	3-WAY VALVE SET TO NORMAL OPEN POSITION? <input type="checkbox"/> (UST Ullage to Vapor Polisher) RE-SET VAPOR VALVE TO AUTOMATIC MODE? <input type="checkbox"/>